

NEW HAZARDOUS WASTE REGULATIONS AFFECTING HHW's

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Our Vision – Healthy Kansans living in safe and sustainable environments.

MAJOR CHANGES

- Adopting through 2006 CFRs (Yellow CFRs)
- New Numbering System
- Four Generator Classifications
- New Generator Classification Names
- New Generator Classification Definitions
- Less Regulation for Generators of between 55 lbs and 220 lbs per month
- Effective date ???

FOUR CLASSES OF GENERATORS

- Conditionally Exempt Small Quantity Generator (CESQG)
(less than 55 lbs/month)
- Kansas Small Quantity Generator (KSQG)
(55 lbs or more but less than 220 lbs/month)
- Small Quantity Generator (SQG)
(220 lbs/month or more but less than 2,200 lbs/month)
- Large Quantity Generator (LQG)
(2,200 lbs/month or more)

Generator size kg of HW/month	Kansas Current Classification	Kansas Proposed Classification	Federal (EPA) Classification
Generators of less than 55 pounds of hazardous waste/month	Small quantity generator	Conditionally exempt small quantity generator	Conditionally-exempt small quantity generator
Generators of 55 lbs or more but no more than 220 lbs/month	Kansas generator	Kansas small quantity generator	
Generators of greater than 220 lbs but less than 2,200 lbs of hazardous waste/month		Small quantity generator	Small quantity generator
Generators of 2,200 lbs or more of hazardous waste/month	EPA generator	Large quantity generator	Large quantity generator

CESQG

- CESQG who generates less than 55lbs/mo of hazardous waste (HW) may
 - Dispose of hazardous waste at a HHW facility willing to accept the waste.
 - CESQG's may transport their own waste to the HHW without a HW transporter registration.
 - HHW's with permitted trailers may pick up CESQG waste.

KSQG

- KSQG who generates between 55 lbs and 220 lbs/mo of HW may
 - Dispose of hazardous waste at a HHW facility willing to accept the waste.
 - CESQG's may transport their own waste to the HHW without a HW transporter registration.
 - HHW's with permitted trailers may pick up CESQG waste.

Review of KDHE Policy allowing
HHW's to accept business waste
under the new regulations.

KDHE INSPECTIONS

- KDHE has begun conducting hazardous waste (HW) inspections at HHW facilities.
- HHW leaving the facility is HW and therefore the HHW facility is a HW generator.
- If KDHE does not conduct these inspections, EPA will.

KDHE INSPECTIONS

- KDHE will do a regular solid waste inspection
- KDHE will review your HW generator status to determine if you have correctly notified (as an LQG, SQG, or KSQG).
 - The generation rate will be based on the amount shipped, because that is when the waste is generated as HW.

KDHE INSPECTIONS

- KDHE will review the HW manifests for compliance with HW regulations.
 - Manifests should be completely filled out and have the correct shipping name and waste codes for each waste stream.
 - The transporter should have an EPA ID number and be registered with KDHE.
 - The TSD should have an EPA ID number.

KDHE INSPECTIONS

- KDHE will review the HW manifests for compliance with HW regulations. (Cont.)
 - The generator's EPA ID number should be the 12-digit number assigned to the HHW (CESQG or "exempt waste" is not acceptable).
- KDHE will review the LDR forms for compliance with HW regulations.
 - Must include the manifest number.
 - Must include waste codes and constituents of concern.

KDHE INSPECTIONS

- KDHE will provide written comments where there are problems with compliance with the HW regulations and work with you to correct these problems.
- If the same problems are observed on subsequent inspections, violations may be cited.

QUESTIONS?

